

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA, *et al.*,

Plaintiffs,

v.

AMERICAN AIRLINES GROUP INC.
and
JETBLUE AIRWAYS CORPORATION,

Defendants.

Civil No.: 1:21-cv-11558

**PLAINTIFF STATES' CONSENT MOTION FOR PAYMENT OF ATTORNEYS' FEES
AND COSTS**

The District of Columbia, the Commonwealths of Massachusetts, Pennsylvania and Virginia, and the States of Arizona, California and Florida, (collectively "Plaintiff States"), by and through their undersigned counsel, submit the following Consent Motion and accompanying Memorandum for Attorneys' Fees and Costs Under Section 16 of the Clayton Act, 15 U.S.C. §26, Rules 7 and 54 of the Federal Rules of Civil Procedure. The Plaintiff States respectfully request this Court to grant this consent motion for the payment of reasonable attorneys' fees and costs to the Plaintiff States.

After negotiations between the Plaintiff States, American Airlines Group, Inc. ("American"), and JetBlue Airways Corporation ("JetBlue," and collectively with American, "Defendants") regarding the amount of reasonable attorneys' fees and costs, the Parties reached an agreement on the amount of reasonable fees and costs, payment of which is conditional upon

final resolution of this litigation in favor of Plaintiff States, without further trial or adjudication of any issue of fact or law, enforceable by all Parties.

Accordingly, Plaintiff States request entry of the proposed Order filed with this Consent Motion to ensure that American and JetBlue's payment to the Plaintiff States may be used as stated in the proposed Order.

Pursuant to L.R., D. Mass. 7.1(a), the counsel for the Plaintiff States conferred with counsel for Defendants who consent to this motion. Plaintiff States' memorandum of points and authorities in support of this request and proposed Order are attached.

Dated: January 17, 2025

Respectfully submitted,

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Certificate of Service

I certify that on January 17, 2025, I caused a true and correct copy of the Plaintiff States' Consent Motion for Payment of Attorneys' Fees and Costs to be served upon the parties of record through the Court's ECF system.

/s/ Joseph S. Betsko

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